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December 11, 2023

Honorable Arun Subramanian
United States District Judge
Southern District of New York
500 Pearl Street
New York, New York 10007

VIA ECF

Re: United States v. Avraham Eisenberg
23 Cr. 10 (AV)

Dear Judge Subramanian:

As the Court is aware, defendant Avraham Eisenberg's ("Eisenberg") was transferred to Metropolitan Detention Center ("MDC") from the Essex County Correctional Facility in early November of this year. Since his arrival at MDC, Eisenberg has had difficulty reviewing the voluminous discovery disclosures in, and materials related to, his case (collectively "Discovery Material") due to various reasons, including very limited access to the single computer on his housing unit that is shared by all the inmates on the floor, the unit computer lacking the appropriate programs to allow him to review numerous items in the discovery (for example, Excel Spreadsheets) and having limited time to use computers in the law library that in any event, also have the same program deficiencies described above. As the April 8, 2024 trial date approaches, Eisenberg respectfully requests that he be provided with adequate opportunity to review the Discovery Materials in preparation for the trial.

For this reason, Eisenberg respectfully requests that the undersigned be permitted to deliver a computer to the government that will subsequently be loaded with the discovery materials, to the extent Eisenberg is not currently in possession of these documents on hard drives, and entirely disabled from accessing the internet, local area networks or other electronic devices by the government. Additionally, the computer will be password protected, maintained by Federal Bureau of Prisons ("BOP") personnel, and provided by the BOP to Eisenberg for use in the visiting room for at least twenty five hours per week.

The government consents to this application, but the BOP objects. In the event

that the Court determines to grant this motion, a proposed Order is attached as Exhibit A in pdf format. For the Court's convenience, a Word version of the proposed Order will be emailed to Chambers. Thank you for Your Honor's consideration of this request.

Very truly yours,

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Sanford Talkin

cc: AUSA Thomas Burnett (by ECF)
AUSA Peter Davis (by ECF)
AAG Tian Huang (by ECF)